SMITH & LOWNEY, P.L.L.C.
2317 EAST JOHN STREET
SEATTLE, WASHINGTON 98112
(206) 860-2883, FAX (206) 860-4187

February 12, 2018

Via Certified Mail - Return Receipt Requested

Managing Agent
G.I. Trucking Co., d/b/a/ Estes West, Estes Express Lines, Inc.
2102 West Valley Highway N
Auburn, WA 98001

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Waste Action Project, P.O. Box 9281, Covington, WA 98042, (206) 849-5927. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Waste Action Project's intent to file a citizen suit against G.I. Trucking Co., d/b/a/ Estes West, Estes Express Lines, Inc. ("Estes") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Estes' National Pollution Discharge Elimination System ("NPDES") permit.

Estes was granted coverage under the Washington Industrial Stormwater General Permit issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and set to expire on January 1, 2015, under National Pollutant Discharge Elimination System Permit No. WAR008739 (the "2010 Permit"). Ecology granted Estes coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number.

Estes has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit and the 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 2102 W Valley Hwy, Auburn, WA 98001(the "facility") as described herein, to Mill Creek. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Estes.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibits discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Estes' discharges not cause or contribute to an excursion of Washington State water quality standards.

Estes discharges to Mill Creek via the City of Auburn storm sewer system. Mill Creek does not meet water quality standards for bacteria, pH, and dissolved oxygen, and is included on the state's "303(d) list" of impaired water bodies. Estes discharges stormwater that contains elevated levels of turbidity, oil sheen, copper, zinc, and pH outside of the permitted range as indicated in Table 1 and Table 2 below. These discharges cause and/or contribute to violations of water quality standards for turbidity, copper, zinc, pH, and aesthetic visual criteria in Mill Creek and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-200(1)(b),(e), (g); (2)(a), (b), (4)(a),(b); WAC 173-201A-240; WAC 173-201A-260; WAC 173-201A-600; and WAC 173-201A-602. Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1: Benchmark Exceedances

Quarter in which sample collected	Turbidity (25 NTU)	Oil Sheen (No Visible Oil Sheen)	Copper (14 µg/L)	Zinc (117 ug/L)
1Q 2016	**84**	**Yes**	14	**200**
2Q 2016	**237**	No	**24**	**310**
3Q 2016	13	**Yes**	10	**140**
4Q 2016	**29**	No	5.3	97
1Q 2017	**124**	No	<.03	31.7
2Q 2017	**49**	**E**	1.2	41.2

3Q 2017	80	No	23.9	235
4Q 2017	260	No	21.8	242

Codes Reported:
E: Analysis not complete/ not conducted/not reported

B. Compliance with Standards.

Condition S10.C of the Permits requires Estes to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). Estes has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

Condition S1.A of the Permits requires that all discharges and activities authorized be consistent with the terms and conditions of the permits. Estes has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this notice of intent to sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

On information and belief, Estes is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A.1 of the Permits requires Estes to develop and implement a SWPPP as specified. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Estes has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits requires Estes to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Estes has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits require that the SWPPP include BMPs consistent with approved stormwater technical manuals, such as the 2014 Stormwater Management Manual for Western Washington (available at

https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Stormwater-permittee-guidance-resources/Stormwater-manuals), the Stormwater Sampling Manual (https://fortress.wa.gov/ecy/publications/SummaryPages/1503044.html), and Suggested Practices to Reduce Zinc Concentrations in Industrial Stormwater Discharges (https://fortress.wa.gov/ecy/publications/documents/0810025.pdf) or document how stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Estes' SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Estes' SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

5. Estes' SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a uniquc identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Estes' SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Estes' SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in

stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Estes' SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the 2010 Permit required that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Condition S3.B.4 of the 2015 Permit also requires that permittees include in their SWPPPs and implement mandatory BMPs subject to the same conditions. Condition S6.C.1 Table 6 requires that permittees discharging to 303(d) listed waters impaired for bacteria include in their SWPPPs and implement certain mandatory BMPs. Estes is in violation of these requirements because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

10. Estes' SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Estes will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

11. Estes' SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

12. Estes' SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Estes' SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

13. Estes' SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

14. Estes' SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required and fails to include a legitimate basis to assert substantial identicality of outfall discharge. The SWPPP does not include a sampling plan that: identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations; documents why each discharge point is not sampled, including the location of which discharge points the Permittee does not sample because the pollutant concentrations are substantially identical to a discharge being sampled and the reasons why the Permittee expects the discharge points to discharge substantially identical effluents; identifies each sampling point by its unique identifying number; identifies staff responsible for conducting stormwater sampling; specifies procedures for sampling collection and handling; specifies procedures for sending samples to the a laboratory; identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits requires Estes to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Estes to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met. On information and belief, the facility has at least two distinct points of discharge off-site, including outfall PT1 and additional unnamed distinct discharge points.

Estes violated these requirements by failing to collect stormwater samples at any of its discharge points in Quarter 1 2013, Quarter 2 2013, Quarter 3 2013, Quarter 4 2013, Quarter 1 2014, Quarter 2 2014, Quarter 3 2014, Quarter 4 2014, Quarter 1 2015, Quarter 2 2015, Quarter 3 2015, and Quarter 4 2015.

Estes has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. These violations have occurred and continue

to occur each and every quarter during the last five years that Estes was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until Estes commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires Defendant to analyze stormwater samples collected quarterly for turbidity, oil sheen, pH, total copper, total zinc and petroleum hydrocarbons. Estes has violated this condition by failing to analyze stormwater samples in Quarter 2, 2017 for oil sheen.

Condition S6.C.1 of the Permits requires Estes to analyze stormwater samples collected for fecal coliform bacteria and pH. Estes has violated this condition by failing to analyze stormwater samples for fecal coliform bacteria each and every quarter in the last five years.

C. Failure to Timely Submit Discharge Monitoring Reports

Condition S9.A of the Permits requires Estes to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Estes has violated these conditions by failing to submit a DMR within the time prescribed for Quarter 1 2013, Quarter 2 2013, Quarter 3 2013, Quarter 4 2013, Quarter 1 2014, Quarter 2 2014, Quarter 3 2014, Quarter 4 2014, Quarter 1 2015, Quarter 2 2015, Quarter 3 2015, Quarter 4 2015, Quarter 2, 2017, and Quarter 3, 2017.

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Estes record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the

time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Estes plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Estes is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements.

Condition S8.B of the Permits requires Estes take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Estes: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits require Estes implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Table 2 of the Permits establishes the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; and total zinc 117 µg/L. Condition S5.B and Table 3 of the Permits establish the following additional benchmark for Standard Industrial Classification (SIC) code 4213 that are applicable to Estes: petroleum hydrocarbons.

Estes has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2012, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements.

Condition S8.C of the Permits requires Estes take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Estes: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Two Corrective Action (planned or taken) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits require Estes implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Estes described in section IV.A of this notice of intent to sue letter.

Estes has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2012 its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Estes' failure to fulfill these obligations for Turbidity, Zinc, and oil sheen triggered by its stormwater sampling during calendar year 2016 and Turbidity, Copper, and Zinc triggered by its stormwater sampling during calendar year 2017.

C. Violations of the Level Three Requirements.

Condition S8.D of the Permits requires Estes take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described by Condition S8.D of the Permits, a Level Three Corrective Action requires Estes: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under

Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits require that a licensed professional engineer, geologist, hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits requires that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the Estes submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits requires Estes fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Estes described in section IV.A of this notice of intent to sue letter.

Estes has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including: the required review, revision and certification of the SWPPP; the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; the required implementation of additional BMPs, including additional treatment BMPs; the required submission of an engineering report, plans, specifications, and an operations and maintenance plan; and the required summarization in the annual report each time since January 1, 2012 its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Estes' failure to fulfill these obligations for turbidity triggered by its stormwater sampling during calendar year 2016.

V. EFFLUENT LIMITATION VIOLATIONS.

Condition S6.C.1 of the 2015 Permit requires Permittees discharging to a "303(d)-listed" waterbody (Water Quality Category 5), either directly or indirectly through a stormwater drainage system must comply with the applicable sampling requirements and numeric effluent limits in Table 6 of the 2015 Permit. The "applicable sampling requirements and numeric effluent limits" means the sampling and effluent limits in Table 6 that correspond to the specific parameter(s) the receiving was is 303(d)-listed for at the time of permit coverage, or Total Suspended Solids (TSS) if the waterbody is 303(d)-listed for sediment quality at the time of permit coverage. Condition S6.C.1 of the 2010 Permit contained substantially identical requirements, but refers to Table 5 of that Permit.

Estes discharges to Mill Creek which is 303(d)-listed for low pH, bacteria, and dissolved oxygen. Estes' discharges are subject to a maximum daily effluent limitation within 6.5 and 9.0 SU for pH, and sampling requirements and mandatory BMPs for fecal coliform bacteria pursuant to Condition S6.C.1 Table 6. Estes discharges stormwater that contains levels of pH outside of range of the corresponding numeric effluent limitation, as indicated in the table of effluent limitation violations below. Each and every one of these discharges is a separate violation of the Permits. On information and belief, these numeric effluent limitation violations also occurred each and every day over the past five years on which there is at least 0.1 inch of precipitation in a 24 hour period and are reasonably likely to recur. Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 2 – Numeric Effluent Limitation Violations

Quarter in which sample collected	pH concentration (limitation: 6.5-8.5)
Quarter 4 2016	6.0 SU

VI. ILLICIT AND PROHIBITED DISCHARGES.

Condition S5.E of the Permits prohibits the discharge of process wastewater (including stormwater that comingles with process wastewater) and illicit discharges. Appendix 2 to the Permits defines "illicit discharges" as "any discharge that is not composed entirely of stormwater." Condition S5.F of the Permits requires Estes to manage stormwater to prevent the discharge of synthetic, natural or processed oil or oil containing products as identified by an oil sheen, and trash and floating debris, prohibiting those discharges. Estes' discharges of synthetic, natural or processed oil or oil containing products and wash water violate these Permit conditions. On information and belief, these prohibited discharges occurred each and every day over the past five years Estes has operated as a trucking terminal and are reasonably likely to continue to occur.

Condition S7.B.3.b of the Permits also requires Estes to eliminate illicit discharges within 30 days of discovery; and Condition S3.B.4.b.i.7 of the Permits require Estes' SWPPP to include measures to identify and eliminate illicit discharges to surface waters. Estes violated these requirements by failing to eliminate its illicit discharges altogether over the last five years.

Additionally, Condition S7.B.3.a of the Permits requires Estes to notify the Department of Ecology within seven days of any discovery of an illicit discharge. Estes violated this requirement by failing to notify Ecology about its illicit discharges within seven days of each occurrence over the past five years.

VII. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Estes to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include

corrective action documentation as required in Condition S8.B – D of the Permits. If a corrective action is not yet completed at the time of submission of the annual report, Estes must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Estes expects to complete corrective actions.

Estes has violated this condition. Estes failed to file annual reports for the 2012, 2014, and 2015 calendar years. The annual report submitted by Estes for 2013 (in July 2013) does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, address any benchmark exceedances, or describe any corrective actions Estes took or planned to implement, and could not have since it was certified by the permittee prior to the year's end. The 2016 annual report submitted does not describe treatment BMPs Estes implemented or plans to implement as part of its Level 3 corrective actions.

VIII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Estes record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Estes collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Estes could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Estes is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Estes to retain for a minimum of five years a copy of the current Permit, a copy of Estes' coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Upon information and belief, Estes is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

IX. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the Permits requires Estes to take certain actions in the event Estes is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, Estes must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Estes must immediately notify the appropriate Ecology regional office of the failure to comply. Estes must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Estes became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, Estes routinely violates these requirements, including each and every time Estes exceeded the numeric effluent limitation, as specified in Table 3, above, each and every time Estes discharges illicit stormwater discharges, as described in section VI to this notice of intent to sue, above, each and every time Estes failed to comply with the corrective action requirements described in section IV of this notice of intent to sue, and each and every time Estes discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as described in Table 1, above. All these violations may endanger human health or the environment.

X. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Waste Action Project hereby requests that Estes provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Estes fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

XI. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Waste Action Project. These violations are ongoing. Waste Action Project intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation that occurred through November 2, 2015, and $53,484 per day for each violation that occurred thereafter. In addition to civil penalties, Waste Action Project will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Waste Action Project believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against G.I. Trucking Co., d/b/a/ Estes West, Estes Express Lines, Inc.. under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: _____

Richard A. Smith
Katherine E. Brennan

cc: Scott Pruitt, Administrator, U.S. EPA
Chris Hladick, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Corporation Service Company, Registered Agent (300 Deschutes Way SW, Ste. 304, Tumwater, WA, 98501

Precipitation Data for SEATTLE TACOMA INTERNATIONAL AIRPORT, WA US, Station No. USW00024233

DATE	PRCP	2/10/2013	0	3/23/2013	0	5/3/2013	0
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1/2/2013	0	2/12/2013	0.04	3/25/2013	0	5/5/2013	0
1/3/2013	0.16	2/13/2013	0.09	3/26/2013	0	5/6/2013	0
1/4/2013	0.1	2/14/2013	0.04	3/27/2013	0.01	5/7/2013	0
1/5/2013	0.12	2/15/2013	0	3/28/2013	0.08	5/8/2013	0
1/6/2013	0.08	2/16/2013	0	3/29/2013	0	5/9/2013	0
1/7/2013	0.09	2/17/2013	0	3/30/2013	0	5/10/2013	0
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1/11/2013	0	2/21/2013	0.02	4/3/2013	0	5/14/2013	0
1/12/2013	0	2/22/2013	0.37	4/4/2013	0.33	5/15/2013	0.04
1/13/2013	0	2/23/2013	0.01	4/5/2013	0.73	5/16/2013	0
1/14/2013	0	2/24/2013	0	4/6/2013	0.5	5/17/2013	0.02
1/15/2013	0	2/25/2013	0.09	4/7/2013	1.54	5/18/2013	0
1/16/2013	0	2/26/2013	0.02	4/8/2013	0.03	5/19/2013	0
1/17/2013	0	2/27/2013	0.18	4/9/2013	0	5/20/2013	0
1/18/2013	0	2/28/2013	0.32	4/10/2013	0.37	5/21/2013	0.54
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1/22/2013	0	3/4/2013	0	4/14/2013	0.23	5/25/2013	0
1/23/2013	0.2	3/5/2013	0	4/15/2013	0	5/26/2013	0.06
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1/25/2013	0.12	3/7/2013	0.29	4/17/2013	0	5/28/2013	0.02
1/26/2013	0.09	3/8/2013	0	4/18/2013	0.21	5/29/2013	0.22
1/27/2013	0.07	3/9/2013	0	4/19/2013	0.81	5/30/2013	0
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1/30/2013	0.14	3/12/2013	0.08	4/22/2013	0	6/2/2013	0.04
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2/1/2013	0.01	3/14/2013	0.11	4/24/2013	0	6/4/2013	0
2/2/2013	0	3/15/2013	0	4/25/2013	0	6/5/2013	0
2/3/2013	0.09	3/16/2013	0.17	4/26/2013	0	6/6/2013	0
2/4/2013	0	3/17/2013	0	4/27/2013	0	6/7/2013	0
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2/9/2013	0.01	3/22/2013	0	5/2/2013	0	6/12/2013	0.01

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7/23/2013	0	9/4/2013	0.01	10/17/2013	0	11/29/2013	0.02
7/24/2013	0	9/5/2013	1.09	10/18/2013	0	11/30/2013	0.09
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6/8/2014	0	7/21/2014	0	9/2/2014	0.12	10/15/2014	0.34
6/9/2014	0	7/22/2014	0.01	9/3/2014	0	10/16/2014	0
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6/29/2014	0	8/11/2014	0.02	9/23/2014	0.72	11/5/2014	0.19
6/30/2014	0	8/12/2014	0.5	9/24/2014	0.8	11/6/2014	0.16
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7/4/2014	0	8/16/2014	0	9/28/2014	0	11/10/2014	0

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11/15/2014	0	12/28/2014	0.16	2/9/2015	0.24	3/24/2015	0.3
11/16/2014	0	12/29/2014	0	2/10/2015	0.01	3/25/2015	0.2
11/17/2014	0	12/30/2014	0	2/11/2015	0	3/26/2015	0
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11/19/2014	0	1/1/2015	0	2/13/2015	0	3/28/2015	0
11/20/2014	0.14	1/2/2015	0.06	2/14/2015	0.01	3/29/2015	0
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11/22/2014	0.02	1/4/2015	0.4	2/16/2015	0	3/31/2015	0.04
11/23/2014	0.47	1/5/2015	0.32	2/17/2015	0	4/1/2015	0.2
11/24/2014	0.05	1/6/2015	0	2/18/2015	0	4/2/2015	0
11/25/2014	0.72	1/7/2015	0	2/19/2015	0.18	4/3/2015	0.06
11/26/2014	0.01	1/8/2015	0	2/20/2015	0.03	4/4/2015	0
11/27/2014	0.13	1/9/2015	0.01	2/21/2015	0	4/5/2015	0
11/28/2014	1.35	1/10/2015	0.23	2/22/2015	0	4/6/2015	0.04
11/29/2014	0.14	1/11/2015	0.06	2/23/2015	0	4/7/2015	0.02
11/30/2014	0	1/12/2015	0	2/24/2015	0	4/8/2015	0
12/1/2014	0	1/13/2015	0	2/25/2015	0.16	4/9/2015	0
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12/4/2014	0.03	1/16/2015	0	2/28/2015	0	4/12/2015	0
12/5/2014	0.12	1/17/2015	1.03	3/1/2015	0	4/13/2015	0.55
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12/7/2014	0	1/19/2015	0.02	3/3/2015	0	4/15/2015	0
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12/11/2014	0.27	1/23/2015	0.23	3/7/2015	0	4/19/2015	0
12/12/2014	0	1/24/2015	0.02	3/8/2015	0	4/20/2015	0
12/13/2014	0	1/25/2015	0	3/9/2015	0	4/21/2015	0.22
12/14/2014	0	1/26/2015	0	3/10/2015	0.03	4/22/2015	0
12/15/2014	0	1/27/2015	0.03	3/11/2015	0.1	4/23/2015	0.12
12/16/2014	0	1/28/2015	0	3/12/2015	0	4/24/2015	0.13
12/17/2014	0.11	1/29/2015	0	3/13/2015	0.08	4/25/2015	0.05
12/18/2014	0.51	1/30/2015	0	3/14/2015	0.67	4/26/2015	0
12/19/2014	0.12	1/31/2015	0	3/15/2015	2.2	4/27/2015	0.01
12/20/2014	0.77	2/1/2015	0.06	3/16/2015	0.04	4/28/2015	0.07
12/21/2014	0	2/2/2015	0.29	3/17/2015	0.03	4/29/2015	0
12/22/2014	0	2/3/2015	0.05	3/18/2015	0	4/30/2015	0
12/23/2014	0.81	2/4/2015	0.33	3/19/2015	0	5/1/2015	0

5/2/2015	0	6/14/2015	0	7/27/2015	0	9/8/2015	0
5/3/2015	0	6/15/2015	0	7/28/2015	0	9/9/2015	0
5/4/2015	0	6/16/2015	0	7/29/2015	0	9/10/2015	0
5/5/2015	0.24	6/17/2015	0	7/30/2015	0	9/11/2015	0
5/6/2015	0	6/18/2015	0	7/31/2015	0	9/12/2015	0
5/7/2015	0	6/19/2015	0.02	8/1/2015	0	9/13/2015	0.02
5/8/2015	0	6/20/2015	0	8/2/2015	0	9/14/2015	0
5/9/2015	0	6/21/2015	0	8/3/2015	0	9/15/2015	0
5/10/2015	0	6/22/2015	0	8/4/2015	0	9/16/2015	0.04
5/11/2015	0	6/23/2015	0	8/5/2015	0	9/17/2015	0.07
5/12/2015	0.17	6/24/2015	0	8/6/2015	0	9/18/2015	0
5/13/2015	0.16	6/25/2015	0	8/7/2015	0	9/19/2015	0
5/14/2015	0.01	6/26/2015	0	8/8/2015	0	9/20/2015	0.16
5/15/2015	0	6/27/2015	0	8/9/2015	0	9/21/2015	0
5/16/2015	0	6/28/2015	0.01	8/10/2015	0	9/22/2015	0
5/17/2015	0	6/29/2015	0	8/11/2015	0	9/23/2015	0
5/18/2015	0	6/30/2015	0	8/12/2015	0.3	9/24/2015	0
5/19/2015	0	7/1/2015	0	8/13/2015	0	9/25/2015	0.08
5/20/2015	0	7/2/2015	0	8/14/2015	1.2	9/26/2015	0
5/21/2015	0	7/3/2015	0	8/15/2015	0	9/27/2015	0
5/22/2015	0	7/4/2015	0	8/16/2015	0	9/28/2015	0
5/23/2015	0	7/5/2015	0	8/17/2015	0	9/29/2015	0
5/24/2015	0	7/6/2015	0	8/18/2015	0	9/30/2015	0
5/25/2015	0	7/7/2015	0	8/19/2015	0	10/1/2015	0
5/26/2015	0	7/8/2015	0	8/20/2015	0.08	10/2/2015	0
5/27/2015	0	7/9/2015	0	8/21/2015	0	10/3/2015	0
5/28/2015	0	7/10/2015	0	8/22/2015	0	10/4/2015	0
5/29/2015	0	7/11/2015	0	8/23/2015	0	10/5/2015	0
5/30/2015	0	7/12/2015	0	8/24/2015	0	10/6/2015	0
5/31/2015	0	7/13/2015	0	8/25/2015	0	10/7/2015	0.39
6/1/2015	0.18	7/14/2015	0	8/26/2015	0	10/8/2015	0
6/2/2015	0.02	7/15/2015	0	8/27/2015	0	10/9/2015	0.01
6/3/2015	0	7/16/2015	0	8/28/2015	0.02	10/10/2015	1.13
6/4/2015	0	7/17/2015	0	8/29/2015	1.28	10/11/2015	0
6/5/2015	0	7/18/2015	0	8/30/2015	0.4	10/12/2015	0.18
6/6/2015	0	7/19/2015	0	8/31/2015	0	10/13/2015	0.05
6/7/2015	0	7/20/2015	0	9/1/2015	0.23	10/14/2015	0
6/8/2015	0	7/21/2015	0	9/2/2015	0	10/15/2015	0
6/9/2015	0	7/22/2015	0	9/3/2015	0	10/16/2015	0
6/10/2015	0	7/23/2015	0	9/4/2015	0	10/17/2015	0.01
6/11/2015	0	7/24/2015	0.01	9/5/2015	0.01	10/18/2015	0.15
6/12/2015	0	7/25/2015	0	9/6/2015	0.21	10/19/2015	0.01
6/13/2015	0	7/26/2015	0.08	9/7/2015	0.01	10/20/2015	0

10/21/2015	0	12/3/2015	0.5	1/15/2016	0.05	2/27/2016	0.13
10/22/2015	0	12/4/2015	0.08	1/16/2016	0.4	2/28/2016	0.82
10/23/2015	0	12/5/2015	0.62	1/17/2016	0.33	2/29/2016	0.09
10/24/2015	0	12/6/2015	0.44	1/18/2016	0.06	3/1/2016	0.81
10/25/2015	0.35	12/7/2015	1.08	1/19/2016	0.49	3/2/2016	0.28
10/26/2015	0.27	12/8/2015	2.13	1/20/2016	0.27	3/3/2016	0.03
10/27/2015	0	12/9/2015	0.53	1/21/2016	1.15	3/4/2016	0.16
10/28/2015	0.13	12/10/2015	0.37	1/22/2016	0.26	3/5/2016	0.19
10/29/2015	0.07	12/11/2015	0.01	1/23/2016	0.77	3/6/2016	0.16
10/30/2015	0.76	12/12/2015	0.63	1/24/2016	0	3/7/2016	0.2
10/31/2015	1.3	12/13/2015	0.05	1/25/2016	0	3/8/2016	0.14
11/1/2015	1.03	12/14/2015	0	1/26/2016	0.3	3/9/2016	0.93
11/2/2015	0.01	12/15/2015	0.06	1/27/2016	0.82	3/10/2016	0.23
11/3/2015	0.03	12/16/2015	0.14	1/28/2016	0.61	3/11/2016	0.32
11/4/2015	0	12/17/2015	0.86	1/29/2016	0.19	3/12/2016	0.15
11/5/2015	0.05	12/18/2015	0.73	1/30/2016	0.05	3/13/2016	0.62
11/6/2015	0	12/19/2015	0	1/31/2016	0	3/14/2016	0.25
11/7/2015	0.5	12/20/2015	0.17	2/1/2016	0.01	3/15/2016	0
11/8/2015	0.26	12/21/2015	1.08	2/2/2016	0.01	3/16/2016	0
11/9/2015	0.13	12/22/2015	0.18	2/3/2016	0.53	3/17/2016	0
11/10/2015	0.05	12/23/2015	0.24	2/4/2016	0.33	3/18/2016	0
11/11/2015	0.06	12/24/2015	0.1	2/5/2016	0.14	3/19/2016	0
11/12/2015	0.39	12/25/2015	0.23	2/6/2016	0	3/20/2016	0.17
11/13/2015	1.32	12/26/2015	0	2/7/2016	0	3/21/2016	0.34
11/14/2015	1.86	12/27/2015	0.34	2/8/2016	0	3/22/2016	0
11/15/2015	0.88	12/28/2015	0.06	2/9/2016	0	3/23/2016	0.23
11/16/2015	0.08	12/29/2015	0	2/10/2016	0.13	3/24/2016	0
11/17/2015	1.16	12/30/2015	0	2/11/2016	0.48	3/25/2016	0
11/18/2015	0.06	12/31/2015	0	2/12/2016	0.8	3/26/2016	0.13
11/19/2015	0.08	1/1/2016	0	2/13/2016	0.49	3/27/2016	0.18
11/20/2015	0	1/2/2016	0	2/14/2016	0.15	3/28/2016	0
11/21/2015	0	1/3/2016	0.02	2/15/2016	0.46	3/29/2016	0
11/22/2015	0	1/4/2016	0.15	2/16/2016	0	3/30/2016	0
11/23/2015	0.12	1/5/2016	0.11	2/17/2016	0.47	3/31/2016	0
11/24/2015	0.28	1/6/2016	0	2/18/2016	0.12	4/1/2016	0
11/25/2015	0	1/7/2016	0	2/19/2016	0.4	4/2/2016	0
11/26/2015	0	1/8/2016	0	2/20/2016	0	4/3/2016	0.16
11/27/2015	0	1/9/2016	0	2/21/2016	0.05	4/4/2016	0.03
11/28/2015	0	1/10/2016	0	2/22/2016	0.17	4/5/2016	0
11/29/2015	0	1/11/2016	0.16	2/23/2016	0	4/6/2016	0
11/30/2015	0.02	1/12/2016	0.51	2/24/2016	0.02	4/7/2016	0
12/1/2015	0.48	1/13/2016	0.75	2/25/2016	0	4/8/2016	0
12/2/2015	0.1	1/14/2016	0	2/26/2016	0.17	4/9/2016	0

4/10/2016	0	5/23/2016	0	7/5/2016	0	8/17/2016	0
4/11/2016	0	5/24/2016	0	7/6/2016	0.01	8/18/2016	0
4/12/2016	0.32	5/25/2016	0	7/7/2016	0.12	8/19/2016	0
4/13/2016	0.1	5/26/2016	0	7/8/2016	0.24	8/20/2016	0
4/14/2016	0.15	5/27/2016	0	7/9/2016	0.01	8/21/2016	0
4/15/2016	0	5/28/2016	0.1	7/10/2016	0	8/22/2016	0
4/16/2016	0	5/29/2016	0	7/11/2016	0	8/23/2016	0
4/17/2016	0	5/30/2016	0	7/12/2016	0	8/24/2016	0
4/18/2016	0	5/31/2016	0	7/13/2016	0	8/25/2016	0
4/19/2016	0	6/1/2016	0.04	7/14/2016	0	8/26/2016	0
4/20/2016	0	6/2/2016	0.01	7/15/2016	0	8/27/2016	0
4/21/2016	0	6/3/2016	0	7/16/2016	0	8/28/2016	0
4/22/2016	0	6/4/2016	0	7/17/2016	0	8/29/2016	0
4/23/2016	0.01	6/5/2016	0	7/18/2016	0.01	8/30/2016	0
4/24/2016	0.3	6/6/2016	0	7/19/2016	0	8/31/2016	0.01
4/25/2016	0.11	6/7/2016	0	7/20/2016	0	9/1/2016	0.17
4/26/2016	0	6/8/2016	0.01	7/21/2016	0	9/2/2016	0.05
4/27/2016	0	6/9/2016	0.13	7/22/2016	0.33	9/3/2016	0
4/28/2016	0	6/10/2016	0.18	7/23/2016	0	9/4/2016	0
4/29/2016	0.01	6/11/2016	0	7/24/2016	0	9/5/2016	0.01
4/30/2016	0	6/12/2016	0	7/25/2016	0	9/6/2016	0.42
5/1/2016	0	6/13/2016	0	7/26/2016	0	9/7/2016	0.04
5/2/2016	0	6/14/2016	0.02	7/27/2016	0	9/8/2016	0.03
5/3/2016	0	6/15/2016	0	7/28/2016	0	9/9/2016	0
5/4/2016	0	6/16/2016	0	7/29/2016	0	9/10/2016	0
5/5/2016	0	6/17/2016	0.14	7/30/2016	0	9/11/2016	0
5/6/2016	0	6/18/2016	0	7/31/2016	0	9/12/2016	0
5/7/2016	0	6/19/2016	0	8/1/2016	0	9/13/2016	0
5/8/2016	0.03	6/20/2016	0.55	8/2/2016	0.13	9/14/2016	0
5/9/2016	0	6/21/2016	0	8/3/2016	0	9/15/2016	0
5/10/2016	0	6/22/2016	0	8/4/2016	0	9/16/2016	0
5/11/2016	0	6/23/2016	0.35	8/5/2016	0	9/17/2016	0.22
5/12/2016	0	6/24/2016	0.34	8/6/2016	0	9/18/2016	0
5/13/2016	0	6/25/2016	0	8/7/2016	0.03	9/19/2016	0.08
5/14/2016	0.02	6/26/2016	0	8/8/2016	0	9/20/2016	0
5/15/2016	0.02	6/27/2016	0	8/9/2016	0	9/21/2016	0
5/16/2016	0.06	6/28/2016	0	8/10/2016	0	9/22/2016	0
5/17/2016	0	6/29/2016	0	8/11/2016	0	9/23/2016	0.01
5/18/2016	0	6/30/2016	0	8/12/2016	0	9/24/2016	0
5/19/2016	0.5	7/1/2016	0	8/13/2016	0	9/25/2016	0
5/20/2016	0	7/2/2016	0	8/14/2016	0	9/26/2016	0
5/21/2016	0.21	7/3/2016	0	8/15/2016	0	9/27/2016	0.02
5/22/2016	0	7/4/2016	0	8/16/2016	0	9/28/2016	0

9/29/2016	0	11/11/2016	0	12/24/2016	0.1	2/5/2017	0.82
9/30/2016	0	11/12/2016	0.1	12/25/2016	0	2/6/2017	0.65
10/1/2016	0.05	11/13/2016	0.24	12/26/2016	0.29	2/7/2017	0.01
10/2/2016	0	11/14/2016	0.31	12/27/2016	0.05	2/8/2017	0.7
10/3/2016	0	11/15/2016	1.08	12/28/2016	0	2/9/2017	1.63
10/4/2016	0.13	11/16/2016	0.2	12/29/2016	0.05	2/10/2017	0.02
10/5/2016	0.04	11/17/2016	0	12/30/2016	0.02	2/11/2017	0
10/6/2016	0.31	11/18/2016	0	12/31/2016	0.03	2/12/2017	0
10/7/2016	0.11	11/19/2016	0.04	1/1/2017	0.43	2/13/2017	0
10/8/2016	0.61	11/20/2016	0.01	1/2/2017	0	2/14/2017	0.23
10/9/2016	0.06	11/21/2016	0.02	1/3/2017	0	2/15/2017	1.63
10/10/2016	0	11/22/2016	0.45	1/4/2017	0	2/16/2017	0.5
10/11/2016	0	11/23/2016	0.13	1/5/2017	0	2/17/2017	0.01
10/12/2016	0.01	11/24/2016	0.66	1/6/2017	0	2/18/2017	0.15
10/13/2016	1.75	11/25/2016	0.01	1/7/2017	0	2/19/2017	0.06
10/14/2016	1.36	11/26/2016	0.38	1/8/2017	0.45	2/20/2017	0.2
10/15/2016	0.73	11/27/2016	0.32	1/9/2017	0.05	2/21/2017	0.07
10/16/2016	0.56	11/28/2016	0	1/10/2017	0.07	2/22/2017	0
10/17/2016	0.17	11/29/2016	0.04	1/11/2017	0	2/23/2017	0.01
10/18/2016	0.08	11/30/2016	0.1	1/12/2017	0	2/24/2017	0
10/19/2016	0.22	12/1/2016	0.01	1/13/2017	0	2/25/2017	0.01
10/20/2016	1.19	12/2/2016	0.27	1/14/2017	0	2/26/2017	0.33
10/21/2016	0.02	12/3/2016	0.18	1/15/2017	0	2/27/2017	0.16
10/22/2016	0.05	12/4/2016	0.17	1/16/2017	0	2/28/2017	0.01
10/23/2016	0.12	12/5/2016	0.24	1/17/2017	1.74	3/1/2017	0.02
10/24/2016	0.1	12/6/2016	0	1/18/2017	1.21	3/2/2017	0.09
10/25/2016	0	12/7/2016	0	1/19/2017	0.09	3/3/2017	0.36
10/26/2016	1.23	12/8/2016	0.06	1/20/2017	0	3/4/2017	0.04
10/27/2016	0.04	12/9/2016	0.34	1/21/2017	0.05	3/5/2017	0
10/28/2016	0	12/10/2016	0.18	1/22/2017	0.08	3/6/2017	0
10/29/2016	0.19	12/11/2016	0.09	1/23/2017	0	3/7/2017	0.75
10/30/2016	0.26	12/12/2016	0.09	1/24/2017	0	3/8/2017	0.13
10/31/2016	0.66	12/13/2016	0	1/25/2017	0	3/9/2017	0.7
11/1/2016	0.22	12/14/2016	0	1/26/2017	0	3/10/2017	0.03
11/2/2016	0.46	12/15/2016	0	1/27/2017	0	3/11/2017	0.37
11/3/2016	0	12/16/2016	0	1/28/2017	0	3/12/2017	0.02
11/4/2016	0	12/17/2016	0	1/29/2017	0.03	3/13/2017	0.65
11/5/2016	1.31	12/18/2016	0	1/30/2017	0.02	3/14/2017	0.39
11/6/2016	0.12	12/19/2016	0.81	1/31/2017	0	3/15/2017	0.81
11/7/2016	0.04	12/20/2016	0.01	2/1/2017	0	3/16/2017	0
11/8/2016	0	12/21/2016	0	2/2/2017	0.01	3/17/2017	0.68
11/9/2016	0.24	12/22/2016	0.3	2/3/2017	0.7	3/18/2017	0.34
11/10/2016	0	12/23/2016	0.58	2/4/2017	0.94	3/19/2017	0

3/20/2017	0.01	5/2/2017	0.13	6/14/2017	0	7/27/2017	0
3/21/2017	0.2	5/3/2017	0.11	6/15/2017	1.05	7/28/2017	0
3/22/2017	0.02	5/4/2017	0.44	6/16/2017	0	7/29/2017	0
3/23/2017	0.26	5/5/2017	0.25	6/17/2017	0.06	7/30/2017	0
3/24/2017	0.24	5/6/2017	0.02	6/18/2017	0	7/31/2017	0
3/25/2017	0.01	5/7/2017	0	6/19/2017	0	8/1/2017	0
3/26/2017	0.38	5/8/2017	0	6/20/2017	0	8/2/2017	0
3/27/2017	0.17	5/9/2017	0	6/21/2017	0	8/3/2017	0
3/28/2017	0.14	5/10/2017	0	6/22/2017	0	8/4/2017	0
3/29/2017	0.51	5/11/2017	0.47	6/23/2017	0	8/5/2017	0
3/30/2017	0	5/12/2017	0.16	6/24/2017	0	8/6/2017	0
3/31/2017	0	5/13/2017	0.03	6/25/2017	0	8/7/2017	0
4/1/2017	0.04	5/14/2017	0.04	6/26/2017	0	8/8/2017	0
4/2/2017	0.04	5/15/2017	0.33	6/27/2017	0	8/9/2017	0
4/3/2017	0	5/16/2017	0.15	6/28/2017	0	8/10/2017	0
4/4/2017	0.12	5/17/2017	0	6/29/2017	0	8/11/2017	0
4/5/2017	0.46	5/18/2017	0	6/30/2017	0	8/12/2017	0.02
4/6/2017	0.26	5/19/2017	0	7/1/2017	0	8/13/2017	0
4/7/2017	0.1	5/20/2017	0	7/2/2017	0	8/14/2017	0
4/8/2017	0.01	5/21/2017	0	7/3/2017	0	8/15/2017	0
4/9/2017	0	5/22/2017	0	7/4/2017	0	8/16/2017	0
4/10/2017	0.38	5/23/2017	0	7/5/2017	0	8/17/2017	0
4/11/2017	0.02	5/24/2017	0	7/6/2017	0	8/18/2017	0
4/12/2017	0.85	5/25/2017	0	7/7/2017	0	8/19/2017	0
4/13/2017	0.08	5/26/2017	0	7/8/2017	0	8/20/2017	0
4/14/2017	0.01	5/27/2017	0	7/9/2017	0	8/21/2017	0
4/15/2017	0	5/28/2017	0	7/10/2017	0	8/22/2017	0
4/16/2017	0	5/29/2017	0	7/11/2017	0	8/23/2017	0
4/17/2017	0.07	5/30/2017	0.01	7/12/2017	0	8/24/2017	0
4/18/2017	0.48	5/31/2017	0.11	7/13/2017	0	8/25/2017	0
4/19/2017	0.35	6/1/2017	0.02	7/14/2017	0	8/26/2017	0
4/20/2017	0.01	6/2/2017	0	7/15/2017	0	8/27/2017	0
4/21/2017	0	6/3/2017	0	7/16/2017	0	8/28/2017	0
4/22/2017	0.07	6/4/2017	0	7/17/2017	0	8/29/2017	0
4/23/2017	0.49	6/5/2017	0	7/18/2017	0	8/30/2017	0
4/24/2017	0.06	6/6/2017	0	7/19/2017	0	8/31/2017	0
4/25/2017	0.05	6/7/2017	0.03	7/20/2017	0	9/1/2017	0
4/26/2017	0	6/8/2017	0.31	7/21/2017	0	9/2/2017	0
4/27/2017	0.04	6/9/2017	0.05	7/22/2017	0	9/3/2017	0
4/28/2017	0	6/10/2017	0	7/23/2017	0	9/4/2017	0
4/29/2017	0.14	6/11/2017	0	7/24/2017	0	9/5/2017	0
4/30/2017	0.08	6/12/2017	0	7/25/2017	0	9/6/2017	0
5/1/2017	0.03	6/13/2017	0	7/26/2017	0	9/7/2017	0

9/8/2017	0	10/17/2017	0.06	11/25/2017	0.19	1/4/2018	0.13
9/9/2017	0	10/18/2017	1.35	11/26/2017	0.25	1/5/2018	0.51
9/10/2017	0	10/19/2017	1.04	11/27/2017	0	1/6/2018	0.17
9/11/2017	0	10/20/2017	0.13	11/28/2017	0.68	1/7/2018	0.33
9/12/2017	0	10/21/2017	1.61	11/29/2017	0	1/8/2018	0.16
9/13/2017	0	10/22/2017	0.02	11/30/2017	0.27	1/9/2018	0.18
9/14/2017	0	10/23/2017	0	12/1/2017	0.27	1/10/2018	0.17
9/15/2017	0	10/24/2017	0	12/2/2017	0.79	1/11/2018	1.12
9/16/2017	0	10/25/2017	0.01	12/3/2017	0.05	1/12/2018	0.1
9/17/2017	0.15	10/26/2017	0	12/4/2017	0	1/13/2018	0.01
9/18/2017	0.16	10/27/2017	0	12/5/2017	0	1/14/2018	0
9/19/2017	0.04	10/28/2017	0	12/6/2017	0	1/15/2018	0.06
9/20/2017	0.13	10/29/2017	0	12/7/2017	0	1/16/2018	0.19
9/21/2017	0.02	10/30/2017	0	12/8/2017	0	1/17/2018	0.43
9/22/2017	0	10/31/2017	0	12/9/2017	0	1/18/2018	0.4
9/23/2017	0	11/1/2017	0.01	12/10/2017	0	1/19/2018	0.03
9/24/2017	0	11/2/2017	0.19	12/11/2017	0	1/20/2018	0.08
9/25/2017	0.01	11/3/2017	0.3	12/12/2017	0	1/21/2018	0.11
9/26/2017	0	11/4/2017	0.42	12/13/2017	0	1/22/2018	0.36
9/27/2017	0	11/5/2017	0.61	12/14/2017	0	1/23/2018	0.88
9/28/2017	0	11/6/2017	0	12/15/2017	0.06	1/24/2018	0.44
9/29/2017	0.07	11/7/2017	0	12/16/2017	0.14	1/25/2018	0.15
9/30/2017	0.01	11/8/2017	0.15	12/17/2017	0.03	1/26/2018	0.41
10/1/2017	0	11/9/2017	0.42	12/18/2017	0.7	1/27/2018	0.55
10/2/2017	0	11/10/2017	0.01	12/19/2017	1	1/28/2018	0.06
10/3/2017	0	11/11/2017	0.05	12/20/2017	0.13	1/29/2018	1.09
10/4/2017	0	11/12/2017	0.52	12/21/2017	0.01	1/30/2018	Trace
10/5/2017	0	11/13/2017	0.81	12/22/2017	0.09	1/31/2018	Trace
10/6/2017	0.01	11/14/2017	0.05	12/23/2017	0	2/1/2018	0.57
10/7/2017	0.01	11/15/2017	0.46	12/24/2017	0.12	2/2/2018	0.08
10/8/2017	0.01	11/16/2017	0.16	12/25/2017	0.09	2/3/2018	0.14
10/9/2017	0	11/17/2017	0	12/26/2017	0	2/4/2018	0.01
10/10/2017	0	11/18/2017	0	12/27/2017	0	2/5/2018	0.03
10/11/2017	0.17	11/19/2017	0.58	12/28/2017	0.34	2/6/2018	0.05
10/12/2017	0.38	11/20/2017	0.63	12/29/2017	1.5	2/7/2018	0
10/13/2017	0	11/21/2017	1.14	12/31/2017	0	2/8/2018	0.05
10/14/2017	0	11/22/2017	0.52	1/1/2018	0	2/9/2018	Trace
10/15/2017	0	11/23/2017	0.2	1/2/2018	0	2/10/2018	0
10/16/2017	0	11/24/2017	0.01	1/3/2018	0	2/11/2018	0